

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

<b>IN RE NEW ENGLAND COMPOUNDING</b>	)	
<b>PHARMACY, INC. PRODUCTS</b>	)	
<b>LIABILITY LITIGATION</b>	)	
	)	
	)	
	)	
	)	<b>MDL No. 2419</b>
<b>THIS DOCUMENT RELATES TO:</b>	)	<b>Dkt. No 1:13-md-2419 (RWZ)</b>
	)	
<b>All Suits Against the Saint Thomas Entities</b>	)	
	)	
	)	
	)	
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**Notice to Victory of 30(b)(6) Depositions**

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Defendants, Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network (collectively the “Saint Thomas Entities”), pursuant to Federal Rule of Civil Procedure 30(b)(6), come now and give notice that the oral and videotaped depositions of Victory Heating & Air Conditioning Co., Inc. and Victory Mechanical Services, Inc. (collectively “Victory”), as organizations, will be taken on the topics detailed below. Victory shall identify the person(s) who will speak on its behalf on each topic at least seven (7) days before the deposition(s).

The deposition will be taken on June 9, 2015, beginning at 9:00 a.m. (EDT) and continuing until completed. The deposition will take place at the offices of Nutter, McClellan & Fish LLP, Seaport West, 155 Seaport Blvd., Boston, Massachusetts 02210. The deposition will be recorded by stenographical means and by video.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), Victory's designee(s) shall be prepared to testify regarding the following subjects:

1. The products and services you provided at the NECC facility;
2. Any complaints regarding the products or services you provided at the NECC facility;
3. All tests, analysis, communications or representations relating to the air pressure at the NECC facility or any products or services you provided;
4. All training, manuals or documentation you provided regarding the operation, maintenance, settings or needs of the HVAC and related systems at the NECC facility;
5. The documents you produced in this MDL, whether to the PSC or in response to any party's request, whether formal or informal;
6. The identity of the persons providing products or services related to the NECC facility and their supervisors and managers;
7. The terms and conditions of the services you provided at the NECC facility;
8. Victory's responses to the Saint Thomas Entities' discovery requests, including without limitation the documents produced in response; and
9. Information known or available to Victory regarding the circumstances of the contamination of MPA at the NECC Facility, the outbreak of fungal meningitis across several states, and the closing of NECC and Ameridose; and
10. Documents produced by any party on the US Legal repository involving any Victory representative or employee.

Respectfully submitted,

/s/ Adam T. Schramek

Sarah P. Kelly (BBO #664267)  
skelly@nutter.com

NUTTER McCLENNEN & FISH LLP  
Seaport West  
155 Seaport Boulevard  
Boston, Massachusetts 02210  
(617) 439-2000  
(617) 310-9461 (FAX)

Yvonne K. Puig\*  
Texas State Bar No. 16385400  
yvonne.puig@nortonrosefulbright.com  
Adam T. Schramek\*  
Texas State Bar No. 24033045  
adam.schramek@nortonrosefulbright.com  
Eric J. Hoffman\*  
Texas State Bar No. 24074427  
eric.hoffman@nortonrosefulbright.com

NORTON ROSE FULBRIGHT US LLP  
98 San Jacinto Blvd., Suite 1100  
Austin, Texas 78701  
(512) 536-2450  
(512) 536-4598 (FAX)

Marcy Hogan Greer\*  
Texas State Bar No. 08417650  
mgreer@adjtlaw.com

ALEXANDER DUBOSE JEFFERSON &  
TOWNSEND LLP  
515 Congress, Suite 2350  
Austin, Texas 78701  
(512) 482-9300  
(512) 482-9303

\*Appearing Pro Hac Vice

**CERTIFICATE OF SERVICE**

I certify that unless noted otherwise below, the foregoing was served by electronic mail on the 28<sup>th</sup> day of April, 2015.

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*Adam T. Schramek*  
Adam T. Schramek

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Alan M. Winchester Frederick H. Fern Harris Beach, PLLC 100 Wall Street New York, NY 10005	J. Gerard Stranch, IV Benjamin A. Gastel Branstetter, Stranch & Jennings PLLC 227 Second Avenue North Nashville, TN 37201 <a href="mailto:gerards@bsjfirm.com">gerards@bsjfirm.com</a> <a href="mailto:beng@bsjfirm.com">beng@bsjfirm.com</a>
Robert H. Gaynor John P. Ryan William J. Dailey , Jr. Sloane & Walsh LLP Three Center Plaza Boston, MA 02108 <a href="mailto:rgaynor@sloanelaw.com">rgaynor@sloanelaw.com</a> <a href="mailto:wdaileyjr@sloanelaw.com">wdaileyjr@sloanelaw.com</a> <a href="mailto:jryan@sloanelaw.com">jryan@sloanelaw.com</a>	Mark Zamora Mark Zamora and Associates 5 Concourse Parkway, Suite 2350 Atlanta, GA 30328 <a href="mailto:mark@markzamora.com">mark@markzamora.com</a>
Bruce A. Singal Callan G. Stein Michelle R. Peirce Donoghue, Barrett & Singal, PC Suite 1320 One Beacon Street Boston, MA 02108-3113 <a href="mailto:bsingal@dbslawfirm.com">bsingal@dbslawfirm.com</a> <a href="mailto:mpeirce@dbslawfirm.com">mpeirce@dbslawfirm.com</a> <a href="mailto:cstein@dbslawfirm.com">cstein@dbslawfirm.com</a>	Rick Ellis Ellis & Rapacki LLP 85 Merrimac Street Suite 500 Boston, MA 02114 <a href="mailto:rrellis@ellisrapacki.com">rrellis@ellisrapacki.com</a>
<i>Counsel for the Caddens, Conigliaros and Chin</i>	Mark P. Chalos Lieff Cabraser Heimann & Bernstein, LLP 150 Fourth Avenue North, Suite 1650 Nashville, TN 37219-2417 <a href="mailto:ecabraser@lchb.com">ecabraser@lchb.com</a> <a href="mailto:mchalos@lchb.com">mchalos@lchb.com</a>

<p>C.J. Gideon Chris Tardio Gideon, Cooper &amp; Essary PLC 315 Deaderick St., Suite 1100 Nashville, TN 37238 <a href="mailto:cj@gideoncooper.com">cj@gideoncooper.com</a> <a href="mailto:chris@gideoncooper.com">chris@gideoncooper.com</a></p>	<p>James Rehnquist Roberto M. Braceras Goodwin Procter, LLP Exchange Place 53 State Street Boston, MA 02109 <a href="mailto:jrehnquist@goodwinprocter.com">jrehnquist@goodwinprocter.com</a> <a href="mailto:rbraceras@goodwinprocter.com">rbraceras@goodwinprocter.com</a></p>
<p><i>Counsel for STOPNC</i></p>	<p><i>Counsel for UniFirst</i></p>
<p>Daniel Rabinovitz Nicki Samson Brady Hermann John Wells Michaels, Ward &amp; Rabinovitz, LLP One Beacon Street 2nd Floor Boston, MA 02108 <a href="mailto:dmr@michaelsward.com">dmr@michaelsward.com</a> <a href="mailto:ns@michaelsward.com">ns@michaelsward.com</a> <a href="mailto:bjh@michaelsward.com">bjh@michaelsward.com</a> <a href="mailto:jkw@michaelsward.com">jkw@michaelsward.com</a></p>	<p>Joseph P. Thomas Joshua A. Klarfeld Ulmer &amp; Berne LLP 600 Vine Street Suite 2800 Cincinnati, OH 45202 <a href="mailto:jthomas@ulmer.com">jthomas@ulmer.com</a> <a href="mailto:jklarfeld@ulmer.com">jklarfeld@ulmer.com</a></p>
<p><i>Counsel for MSM</i></p>	<p>Robert A. Curley , Jr. Curley &amp; Curley P.C. Suite 103 35 Braintree Hill Office Park Braintree, MA 02184 <a href="mailto:rac@curleylaw.com">rac@curleylaw.com</a></p>
<p>Franklin H. Levy Lawson &amp; Weitzen 88 Black Falcon Avenue Suite 345 Boston, MA 02210 <a href="mailto:flevy@gmail.com">flevy@gmail.com</a></p>	<p><i>Counsel for GDC</i></p> <p>Matthew P. Moriarty Kimberly Langelier Tucker Ellis 950 Main Avenue, Suite 1100 Cleveland, OH 44113 <a href="mailto:matthew.moriarty@tuckerellis.com">matthew.moriarty@tuckerellis.com</a>, <a href="mailto:kimberly.langelier@tuckerellis.com">kimberly.langelier@tuckerellis.com</a></p>
<p><i>Counsel for Alaunus</i></p>	
<p>Peter Hermes 265 Franklin Street, Seventh Floor Boston, MA 02110 <a href="mailto:phermes@hermesnetburn.com">phermes@hermesnetburn.com</a></p>	<p><i>Counsel for Ameridose</i></p>
<p><i>Counsel for Liberty</i></p>	

	<p>Michael P. Sams Kenney &amp; Sams, P.C. 225 Turnpike Road Southborough, MA 01772 508-490-8500 Fax: 508-490-8501 <a href="mailto:mpsams@KandSlegal.com">mpsams@KandSlegal.com</a></p>
	<p><i>Counsel for Victory</i> <i>By E-mail and U.S. Mail</i></p>